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Attorneys for Plaintiff
PERDANA CAPITAL (LABUAN) INC.
A Malaysian Corporation

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

PERDANA CAPITAL (LABUAN) INC., a
Malaysian corporation,

Plaintiff,

vs.

MOHAMMAD AKRAM CHOWDRY, an
individual; HI-TECH VENTURE
PARTNERS, LLC, a Delaware Limited
Liability Company; HI-TECH ASSOCIATES,
a California Limited Liability Company; and
DOES 1-50,

Defendants.

Case No.: CV-09-1479 PJH

Assigned to Hon. Phyllis J. Hamilton

**STIPULATION TO CONTINUE
DEADLINES FOR FILING FIRST
AMENDED COMPLAINT AND
RESPONSE THERETO**

Date: July 29, 2009

Time: 9:00 a.m.

Dept.: Courtroom 5

WHEREAS, on July 29, 2009, the Defendants' Motion to Dismiss for Failure to State a Claim (Fed. R. Civ. P. 12(b)(6)) or in the Alternative, for a More Definite Statement (Fed. R. Civ. P. 12(e)), and for Failure to Join a Required Party (Fed. R. Civ. P. 12(b)(7)) came before the Court, the Honorable Phyllis J. Hamilton presiding;

WHEREAS, the Court granted in part and denied in part Defendants' motions, as set forth in the Minutes and in the transcript of the proceedings;

1 **WHEREAS**, the Court granted Plaintiff leave to amend the complaint, and ordered that
2 any amended complaint be filed no later than August 10, 2009;

3 **WHEREAS**, the Court further ordered that Defendants must file their response to any
4 amended complaint no later than August 31, 2009;

5 **WHEREAS**, pursuant to Northern District Local Rule 6-2(a), "[t]he parties may file a
6 stipulation, conforming to Civil L.R. 7-12, requesting an order changing time that would affect
7 the date of an event or deadline already fixed by Court order, or that would accelerate or extend
8 time frames set in the Local Rules or in the Federal Rules";

9 **WHEREAS**, Plaintiff's counsel requires additional time to file its First Amended
10 Complaint due to the time difference between the United States and Malaysia, where Plaintiff's
11 representatives are presently located, certain language barriers, and the travel schedule of
12 Plaintiff's representatives;

13 **WHEREAS**, Plaintiff's representatives have informed Plaintiff's counsel that they will
14 be unable to review the present draft of the First Amended Complaint until Monday, August 10,
15 2009, and therefore Plaintiff's counsel will require until Wednesday, August 12, 2009 to file the
16 First Amended Complaint;

17 **WHEREAS**, in exchange for providing two additional days in which to file the First
18 Amended Complaint, Plaintiff has agreed to provide Defendants with two additional days in which
19 to file their response to the First Amended Complaint, i.e., by Wednesday, September 2, 2009;

20 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by the
21 undersigned parties as follows:

22 1. The First Amended Complaint shall be served and filed no later than **Wednesday,**
23 **August 12, 2009** (rather than August 10, 2009); and

24 2. Defendants' response to the First Amended Complaint shall be served and filed
25 no later than **Wednesday, September 2, 2009** (rather than August 31, 2009);

26 3. There will be no other changes to existing court-ordered deadlines and
27 appearances.

DATED: August 6, 2009

By: /s/ Joseph Kouri

A Malaysian Corporation

DATED: August 6, 2009

By:

ASSOCIATES

DATED: August 6, 2009

By: /s/ Joseph Kouri

Joseph Kouri (State Bar No. 133804)

DATED: August __, 2009

By:

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Case No.: CV-09-1479 PJH

1 **IT IS SO STIPULATED.**

2 Respectfully submitted,

3 DATED: August 6, 2009

KAUFMAN DOLOWICH VOLUCK & GONZO LLP

4 By: /s/ Joseph Kouri

5 Joseph Kouri

6 Attorneys for Plaintiff

PERDANA CAPITAL (LABUAN) INC.

7 A Malaysian Corporation

8 Respectfully submitted,

9 DATED: August 6, 2009

LAW OFFICES OF MICHAEL Q. EAGAN

11 By: Michael Eagan /mec

12 Michael Q. Eagan

13 Attorneys for Defendants

MOHAMMAD AKRAM CHOWDRY, HI-TECH

14 VENTURE PARTNERS, LLC; and HI-TECH

ASSOCIATES

16 I, Joseph Kouri, am the ECF User whose ID and password are being used to file this
17 ADR Certification by Parties and Counsel. In compliance with General Order 45, X.B., I hereby
18 attest that Michael Q. Eagan has concurred in this filing.

19 DATED: August 6, 2009

20 By: /s/ Joseph Kouri

21 Joseph Kouri (State Bar No. 133804)

22 jkouri@kdvglaw.com

23 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

24 DATED: August 10, 2009

25 UNITED STATES DISTRICT COURT
26 NORTHERN DISTRICT OF CALIFORNIA

27 By: _____

28 The Honorable Phyllis J. Hamilton

STIPULATION TO CONTINUE DEADLINES FOR
COMPLAINT AND RESPONSE

Case No.: CV-09-1479 PTH

